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TRANSCRIPT
Roundtable on Ten-Digit Numbering and E911 Requirements for VRS and IP Relay
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MICHAEL JACOBS: We're going to get started. Thank you very much, everyone for being here. I'm Michael Jacobs from the FCC here, I'm just going to cover some ground rules, not ground rules, but housekeeping matters. And then sort of put it to you all. Because there's so many people here, we're going to dispense with going around the room for introductions. One thing which I'll again emphasize in a minute is that, when you do, when you're about to speak, please introduce yourself with your name. We have a CART writer here. We have people, as you know, participating on the phone. We have a lot of people in the room. So just quickly, state your name before you make any comments.

So, we plan on this being about two hours. I think I wrote that in an email. Very good news on the ex parte front, which is that this is very user friendly. As I said, we do have CART we'll have a transcript from that. We'll enter that into the record. So no one needs to file ex parte letters. This is an interesting ex parte situation, because we have a lot of pleadings in the docket, which are in the rule making realm. A few that are also in the docket, but are in the adjudicatory record, but again, no ex parte problems, you don't need to worry about ex parte submissions.

So as for —— I want to reiterate, when you are about to say something, please state your name. At least maybe the first couple of times, also who you're with. When you do that, let's really try to keep it to one at a time. Again, because we have interpreters, and people on the phone, and relay interpreters and so many people in the room, you know, I don't think anyone wants to be in the role of traffic cop, so let's try to mind that dynamic.

Thank you. Understand that again, it's a good practice to allow a slight lag between speakers, particularly to give the interpreters a chance to catch up. And that's about it. So we're here, said in the email to discuss a whole about standing technical issues full implementation of numbering. Which is November 12th there. Are about 15 pending pleadings here, ranging on all sorts of issues.

And we didn't come here to be a sounding board, or to grill you, we came here basically to have you all talk to each other. We understand there's been quite a need for that. So in other words, the FCC is here in listening mode. And really just to facilitate conversation. So at this point, we're just going to turn it over to whoever wants to start talking. We don't want —— again, please, we're not here for a speechafying, or sound bites.

We're here to hopefully trying to move closer to resolving some of the outstanding technical issues, which as we heard this morning, seem to be hampering full implementation of numbering and causing confusion in the consumer community. So I will just now turn it over to whoever wants to start.

BRIAN ROSEN: This is Brian Rosen from Neustar, I want to make sure the people in the FCC know that the providers talk to one another regularly, there's a technical meeting every Monday afternoon, there's effectively a management meeting once a month on Wednesday.
They get together, there is a fairly free discussion among providers where it's possible for providers to agree on things, things get done very often there is no agreement, at least everyone understands every one's point of view there. is dialogue underway. Many of the issues that are frustrating people, are believed by providers, I'm stating my opinion, things the FCC has to clarify or make a decision on, because the providers aren't able to.

MICHAEL JACOBS: That's heartening to here.
Hopefully we'll hear from one —— Jeff Rosen of SNAP has been raising his hand.

JEFF ROSEN: Yes. I'm Jeff Rosen from SNAP VRS. I want to thank you the commission for hosting this conversation, not only now, but this morning, it was very productive I felt in my estimation, we can all work together, we can work together in our common interesting and dialogue. For today's session, I'm not entirely clear about what our objective is. I've heard some generalities, my feeling is that we need to impose some kind of structure on our conversation and have something closer to an agenda, or prioritization of what we're going to be discussing. The commission can start by talking about your priorities and expectations in the coming months and weeks, what exactly is getting your attention that would impose the kind of structure we can use to work, rather than pulling things out of the air randomly. That's just my discussion. Of course, this is your meeting as much as it is ours.

But I just wanted to hear a little bit at the outset from the commission to see where your focuses lie, what kind of priorities or expectations you're going to be coming out with in the next few weeks.

MICHAEL JACOBS: Our focus lies, without saying —— I'm speaking on behalf of myself now. But I believe that our focus lies in just the seamless transition on November 12th to full implementation of numbering. Again, I'm looking here at a series of pleadings of unresolved technical issues, some of which the ball really is in our court to resolve, some of which seem to be he said—she said sorts of scenarios. And we're just trying to again, cut through some of the rhetoric or misunderstandings and try to bring resolution to them.

I know that there's been some concern in the advocate community about the course this is taking. So, instead of my talking more, why don't I turn it over, I think Karen had her hand up first.

KAREN STRAUSS: This is Karen, I'm representing CSDVRS I have a suggestion for how to get this moving. Downstairs it was note that there were four issues that had been outstanding, that were absolutely needed to be resolved to get numbering going. The first one, reverse look up database, that's been done. The second was public education and outreach to consumers, we already talked about that downstairs.

The third one was porting issues, and the fourth is geographical number issues. Now there are several more in addition to those, but since those seem to be the most pressing to get the numbering system implemented by November 12th, I guess I'm going to make the recommendation that we talk about, start with talking about those two issues, porting and geographical numbers and —— I just want to reiterate what Brian Rosen said that the providers do talk to each other once a week, and providers talk to consumers. And so, I think that we know where everybody at the table stands, and actually, I think we're sort of looking for some guidance from the FCC on these issues and also seeking guidance for what more you need to get resolution of these issues before November 12th.

MIKE JACOBS: Okay, Rosaline?
There's loop and phone, they're different.

ROSALINE CRAWFORD: I represent the National Association of the Deaf. In addition to the couple of outstanding items that Karen has mentioned, I came prepared with a list. And I'm happy to use this list or any other list to go through. But I'll be ticking off on my list as we discuss issues which do include the two that Karen just mentioned.
But I think in addition to the ones that were mentioned downstairs, in particular, there are two or three that come to my mind off the top of my head that do need to be resolved prior to November 12th that are really of concern to consumers. And that is the recent order on 800 numbers, and not residing in the ITRS database.

Disallowance of people who hear but sign getting numbers and being allowed to interconnect with family and friends and service providers through the ITRS database. And caller ID having pass-through of caller identification, both ways, not just on the individual's video phone, but we've also experienced when hearing people call to a business, the caller ID number that comes through on their system is that of the relay provider and not the consumer. So those are just a few other, I'd just like to throw on the table. And we can just make a list and keep running through them.

MIKE JACOBS: Why don't we, Elliot also had his hand up. Let's let him say what he needs to say. Maybe at that point we'll circle back to you and start substantively discussing some of the things he brought up.

ELLIOT GREENWALD: Counsel to TDI, I fully agree with everything that Rosslyn just said, I would like to add to this priority list, 911 call backs from PSAPS and 911 calls as well as standardized handling of dropped or disconnected 911 calls. But I would suggest that the first thing we start with is the rate center issue. Just so we can start with something. And all right —— I'll say a couple of words on that.

I think the Sorenson filed a petition, the consumer groups filed comments on that. Several other providers filed comments. I think that's something that the commission really needs to resolve real soon, so that people can get their numbers. The consumer groups expressed a particular concern that there were no rate centers available in entire states, CSDVRS mentioned their

comments, they could not get any rate centers in Alaska or Hawaii, level three which is the numbering partner for a number of providers mentioned that as a result of regulatory problems in New Hampshire, it could not get any rate centers in New Hampshire and has a pending petition before the commission to deal with that.
So we'd like to see these issues addressed and dealt with.

AL SONNENSTRAHL: There's a question among us, this is Al, I will stand. I do have a question. Can you please define "rate center"?

ELLIOT GREENWALD: Sure. A rate center is basically a hold over from the way the original telephone system is set up —— was set up and is still being used, basically it's the very local geographic unit of the telephone network. And so, basically each NXX code is associated with a rate center.

MIKE JACOBS: All right. I guess this is one where it's the commission's turn to talk. This is Mike Jacobs again. All I can say about that is that it's very much on our radar screens and it's something that I think we can resolve —— that we can take off the table and that we will be able to resolve hopefully sometime soon. Again, given that ——

JEFF ROSEN: I'm sorry, about the rate center you're speaking of? Which issue in particular, the rate center?

AL SONNENSTRAHL: What did you say?

JIM HOUSE: He's asking what issue are you speaking of, and the clarification was for the rate center.

BILL DEVER: I think it would be helpful on the 800 number issue —— or on the geographic number issue if we could get a sense of the say percentage of your users that are impacted by this problem in terms of, is it a few hundred people, a few thousand people? November 12th is about everybody moving forward with the ten digit numbering. But it's hard to gauge at this point how many people are say, left out if they are just getting a number that's nearby or an 800 number.

JIM HOUSE: I'm from TDI. I'm now standing. I have applied for several 800 numbers, let me clarify, actually, ten—digit numbers, everything's been fine, except for in one situation, I got a DC telephone number because the Maryland numbers had run out. I'm in Maryland, so a DC number doesn't really function well for me.

BILL DEVER: Would it be helpful if there were any providers that could tell us how many of your users you feel are impacted on November 12th?

JOHN HARRIS: I'm with CSDVRS, in total so far, we've probably got maybe 100 users that are impacted by numbers that were unable to get in a rate center. So that's kind of been our experience, but I think it's going to grow as November 12th looms and you can't provide service

and you receive calls from people in those areas. And you know, the direction that I think we're all looking for is, what do we do? Do we get a waiver, do we give them another number? What is the FCC going to allow?

BILL DEVER: Sure, there are several proposals that are before us.

GEORGE SUITCLIFF: I'm with Purple, I don't have specific numbers on population base, but I think the level three filing was very telling in the telecom side. They're able to obtain numbers, in its 6,000 rate centers with the country having in excess of 20,000 rate centers. So you have the largest carrier admitting they can only provide local phone numbers in a third of the rate centers in the market. How that translates to the population —— because obviously there's a lot of low population rate centers, but as we talked this morning, there's a lot of rural consumers.

BILL DEVER: That's helpful. I would like to perhaps add another topic to our list, because I know we had the list of five and geographic numbers was one of them. But also, I would be interested from the FCC's standpoint in understanding a little bit more about the D—links issue. If you know that there are D—links customers of yours that are out there for some —— for one reason or another, tell us if you're not able to replace a device that they have.

ROSALINE CRAWFORD: I'm from the National Association of the Deaf. Not on that issue, but continuing on the issue about rate centers, one the proposals for a temporary fix for the rate center issue was to give folks 800 numbers. And now we don't have 800 numbers in the ITRS database, so if any consideration was being thought about using 800 numbers as a temporary fix until rate center numbers become available, you to put the 800 numbers back in the ITRS.

JEFF ROSEN: I'm from SNAP, is that the official position of NAD? Or is that just your personal view?

ROSALINE CRAWFORD: I was just noting somewhat of a conflict between a proposed solution that's running afoul of the recent FCC order. The position of the NAD with respect to the 800 numbers is, they need to be in the ITRS database, period.

BILL DEVER: Roseline, the clarification that the FCC put out was not to say that the 800 numbers would not work, it's that they would not be routed in the ordinary way rather than routed through the ITRS data base. So, if an 800 number perhaps were used to solve the geographic location problem, it could certainly be associated with a ten—digit —— proximate number in the database that would map to whatever the person's 800 number was.

ROSALINE CRAWFORD: My understanding of the 911 connection, and having a ten—digit number, which is geographically based and how the 800 numbers relate to, you know that you have to have the 800 tied to a regular ten—digit number. And you can finesse the ten digit number in terms of routing to it the appropriate PSAP, it can be finessed, it's finessed in the system already. The problem with the 800 numbers not residing in the ITRS database is that if they don't, then it blocks call connection between consumers point to point video.

They are unable to connect point to point if the 800 number doesn't reside in the database at all. And the same thing with say, for example, a business. They would only be able to accept calls from hearing people using a relay center. But they wouldn't be able to get connected to any deaf user whose are using a video phone. Because the 800 number resides some where outside of the ITRS database.

Phone: BRIAN ROSEN: That's not technically correct. You can make point to point calls, but you have to make point to point calls using the local number. So, the calls work, but, the limitation is instead of handing your deaf friends your 800 numbers, you have to hand them your geographic number which is a difference, but, it works. It just works differently than a hearing person to whom you can hand the 800 number and they can connect to you. I would also point out that another thing you can't use is use an alternate provider because, —— because if you gave them the 800 number to call, it wouldn't work.
But the other point that you made, which is what was it, the callback problem, that really does work. You can call back either way. And it will work.

BILL DEVER: You can call back 911?

Phone: Call back from 911 using either the 800 number or the other number would work.

GEORGE LYON: I'm from Purple. From Purple's standpoint, we agree with the recent petition filed by CSDVRS that not having the 800 number in the database as well as the local number creates problems. And to suggest that the consumer can just give his regular ten—digit number, it's really anti—choice and anti-consumer. We're in a situation now, or we should be in the situation where you should be able to receive a call on your 800 number, or on your ten—digit number. And you should be able to receive a point to point call from any provider, not just from someone else who uses your provider. The telephone system shouldn't be set up to be segregated where you have to give one number for one purpose, and another number for another purpose. Universally, you should be able to, and what's functionally equivalent is you give your number, whether it's a 800 number or a ten—digit number, and you get the call. If you don't get the call, it's not functionally equivalent and we have a problem.

Phone: This is Sherry. Can you hear me. It's Sheri from California. Hello, everyone. Michael, thank you so much for asking me to join this afternoon. I appreciate that. I appreciate this opportunity to be apart of this crucial meeting. And really, I appreciate everyone all, all of your feedback this morning, all of the stuff we did online, from my home, all of you look great!
Ha, ha, ha. I just want to make sure that we use our time wisely. I understand that we're talking about the 800 number. And really we need to emphasize that there are many, many, users who do not want an 800 number, period. They want a real local ten—digit number. Okay. And with that, it would be nice, and with regard to the rate center issue, several comments were filed in regard to that, and having the 800 number and the gate number. And I'm not really clear on that what the provider means by that. I hope it doesn't mean a 800 number, is what that means, it's not a functional equivalent. And for businesses, people who buy their 800 numbers, should definitely be able to have that number in the IT database. And for 800 numbers to be used like a

regular telephone number, I would say, no to that. And I want to be clear on that, on the difference here.

And really, I want to ask all of you, and the FCC to manage this meeting and really with a goal in mind, and be ready by November 12th, 13th is the day that this all needs to be up and running and established.

We're all providers, the providers are ready. And my question is that if we're not ready, why aren't we? The issue of the call—back should be top priority, here. Because that in my mind was exactly what I supported —— was not the call—back. The function was not ready. I think Brian, you proposed something to the FCC in regard to that, a solution. And I haven't heard a response from that. Did the FCC accept your proposal, your solution? And if not, why not? We need to go ahead and go with these issues, and get everyone ready. And if we're not ready, why aren't we ready? That's what I have to say right now. Thank you.

MIKE JACOBS: Before we switch swears to another issue, maybe we should sort of close out the 800 and rate center issues. I think you wanted to say something about that. So why don't you go ahead.

ROSALINE CRAWFORD: On the 800 number issue, it is my understanding and, providers can correct me if I'm wrong, but the vast majority, if not virtually all ten—digit numbers that have been assigned to VRS numbers have a corresponding 800 number associated with them. And consumers have generally been told you can use either or both. You can use the 800 number, just like your ten—digit number, you can give it away to your friends and families. Please tell me, which do you want to show up on your screen as your caller ID. The 800 number as your caller ID or your local number as your caller ID. The ITRS ——

Phone: You definitely want that local number.

ROSALINE CRAWFORD: There are lots of 800 numbers already in the ITRS database that consumers are in fact using to place calls both VRS and point to point and to tell them today that it can not be in the ITRS data base and that their call functions will be limited and not functionally equivalent and to make this change before November the 12th, you're asking too much of everybody. And... I urge you, urge you, to rescind that order immediately.

JEFF ROSEN: May I follow up? We've not assigned any 800 numbers, reason being, they're not real. They're not appropriate for these consumers. They're like, proxy numbers that can't be in the system. People need real legitimate numbers as my colleague said. I'm very comfortable with what Rosaline had to say. We found ourselves in a situation where we don't quite know how to proceed. We got there in a very strange way. And I'm not comfortable with the idea of making this a permanent fixture.

And I think we need to transition. The intent of the FCC was to get people back to the normal route. And I'm in support of the idea of such a transition. Like I seem to hear you saying, as

well, we need to find some kind of way, rather than cutting everyone off, cold turkey. I think we need to clarify that. And Sheri said, indeed, the consumers want legitimate numbers. They don't want this convoluted confusing mess. It doesn't make any sense. It doesn't work for our population, such as than been stated. A lot of the forms you're entering on the internet for applications, or placing orders, or making purchases aren't going to accept toll free numbers, it's not a great alternative. But thank you so much for bringing that up, Rosaline.

AL SONNENSTRAHL: I'm representing the consumers. I personally believe that all of us, let me go back. I'm just figuring out how many ten—digit numbers have been given out? The maximum would be maybe —— almost 10 billion numbers? In total? And I would assume about half a billion numbers, maybe 5 billion, maximum are currently available.
Now I can get a ten—digit number for this device that I'm holding in my hand for each IP relay service. And I could get an 800 number and that would then duplicate the number of numbers that I have. Plus, on my computer, I could get another 20 with my video phone. I could get —— I mean, so that by the time we're done, I could have 20 or 30 numbers, and that would be some sort of a geometric progression of numbers.

So I feel that we should have a local number. And if we want an 800 numbers, then we should be permitted to buy them on our own, and the system should be open to accepting those 800 numbers that we purchase for ourselves. Then, regarding call—backs, there is a lot of confusion with this topic. We know that when a relay user who has two legs to call the 911 center, one is going to the relay center. And that's a internet line, and then from the relay center to the 911 center, that leg of the call is another line.

I believe someone mentioned something regarding the call—back between the 911 center and the relay center.

MIKE JACOBS: Can I cut you off for a second. Let's address call—backs a little later. I don't want to veer to a new ——
You know, we do want to hear what you have to say. But I think that we had some response to the —— do you have anything about the 800 numbers?

BILL DEVER: Nobody special, I was wondering if any one from Sorenson had any contrary view on the role of 800 numbers for customers in.

SORENSON: The consumer groups have represented our opinion as well. That they should have a opportunity to get 800 numbers, but more importantly they should be assigned a local number. We encourage them to use that, the local number. So, I don't think it's any different position than what the consumer groups are saying.

SORENSON: I was just saying that, you know,
Sorenson's position is, I believe its important the way the consumer groups have discussed the role of the 800 numbers, we're supportive of that moving forward, and that each customer should receive a local 10—digit number. That should be a primary number for them. But they should

have the opportunity to acquire a 800 number if they wish.

ROSALINE CRAWFORD: On the subject of 800 numbers and Sorenson, I have personally established and obtained ten digit numbers from Sorenson in two different locations. I happen to have a daughter who's deaf. I helped with the application of the ten—digit number, and in both of those instances, I was offered, I didn't request. I was simply provided both an 800 number and a ten—digit number. And I specifically told the installation person, I do not want an 800 number. I do not want to use the 800 number. Please take the 800 number away. And I still have 800 numbers.

MIKE JACOBS: Rich from the FCC was just starting to make a point.

RICHARD HOVEY: When people say consumers should have a right to acquire an 800 number, would they clarify whether they mean acquire it from a VRS provider, or acquire it from an 800 responsible organization that issues 800 numbers? Because any consumer, deaf or otherwise can go out today, to any of a hundred responsible organizations and get an 800 number that will map to their ten—digit geographic number. So you have to, for our purposes, clarify whom you mean to acquire the 800 number from. When you say they should have a right to acquire it.

KAREN STRAUSS: There's ramifications of what you just said that maybe not all the consumers understand. I think, but if you get an eight hundred number from a responsible organization that's happened to a ten digit number and it's not allowed in the database, in the TRS database, it's not going to perform, correct me if I'm wrong, the same way that 800 numbers given out by responsible organizations work for hearing people. That's what the concern is.

RICHARD HOVEY: It's procedural issue, if a provider can put in an 800 number that they got from a responsible organization, you could have procedures and say, you're my default provider for my ten—digit number, can you put this in the database. Nobody's doing that. But technically, it's ——
It's not —— it's not —— they're not mutually exclusive.

KAREN STRAUSS: Many of us are functionally in agreement. That the goal here is functional equivalency and interoperability, and we have a interoperability rule on the books. The way the FCC's order has been phrased. The effect is to negate that interoperability. It was said just earlier that you will not be able to make a call, a dial—around with 800 numbers and you can't go point to point unless you are used a closed system within a existing provider. That's not functional equivalency, regardless of how you achieve it. The goal is to make sure that people can get 800 numbers, especially deaf businesses, whether or not they have to pay for them or not, I think that we're okay with that.

RICHARD HOVEY: Pay who for them?
This is my point. Who are they paying? The provider or a responsible organization?

KAREN STRAUSS: Well, maybe I can pass it to John, it depends, but let me just finish. The goal is, functionally we want that number to work the same way for deaf people as it does for hearing.

JOHN HARRIS: I'm not particular with the difference between a provider and a ——

RICHARD HOVEY: It's a big difference in terms of ownership and porting of that number. And routing of that number. Most providers 800 numbers route to the provider's trunk. A personal —— if you go to a responsible organization, it's going to route to the ten—digit number.

JOHN HARRIS: The 800 numbers that we provide our customers have all been at their request. We do not choose to give our customers 800 numbers. They want them. So we provide ten—digit geographic numbers to all of our customers that purchase our phone. And for those that do not want to purchase a phone, but they want to have their customers, especially some businessmen that use, or businesswomen that use Sorenson VP 200, if they want our relay service to answer their calls, they have obtained an 800 number from us.

And so, they can continue to use the VP 200, yet they can receive calls through CSDVRS. And there are many businesses, I have one of their business cards right here, who choose to do this. And they can also receive calls from other deaf consumers who have local numbers on other video phones they have if we're allowed to put that 800 numbers in the ITRS database. So, in respect to 911, the calls that are being made by a consumer to 911 have, certainly this case, have nothing to do with the 800 number that we're providing. There's no affect on the public safety. There's just convenience to both the deaf consumer and anyone who wants to call me.

KENT CHARUGUNDLA: In regard to the last statement, there's a technical problem in that. If a deaf consumer has only a 800 number, and if that number is assigned into the ITRS database, and for us, as a new provider, we take over that port to us, it's impossible, because we can't take it. Because the responsible organization who controls that number has to put pull the number from one spot to one spot. However if the consumer has a ten—digit number with a 800 working as a switch, not a dedicated a switch to 800 pointed to a ten—digit number, then it is possible for us to port that number within the database from one provider to another. So we need to be very clear on how we define an 800 number assignment to an end—user customer. Thank you.

SHERI FARINHA: Okay, Michael. I wanted to make sure that you understand clearly what's happening. Because, really we need for the FCC to step in on this issue. I understand what Rosaline is saying, and I understand what others are saying. But Jeff is right in connection with users wanting a local ten—digit phone number, okay.

I think what's important for you to understand is that before the phone numbers are given out, Sorenson, sorry to point fingers at you, I hate to have to do this, but I'm not happy with the time frame. You know, before you give out the ten—digit numbers, you went ahead and gave out the

800 numbers. That was set up before the ten—digit numbers went out. So this situation is asking that —— we're worrying about who is using that 800 number instead of their local ten—digit numbers, so I'm asking Sorenson to go ahead and develop a solution for this and how we can remove those 800 numbers from your system and only use the local ten—digit numbers. And those who later would like to purchase that 800 number, then they can do that, go to a neutral party and purchase that 800 number and register for that 800 number with the ITRS database so that we can all be in agreement. Does that make sense? Am I clear?

MIKE JACOBS: So Sorenson was singled out. Any response there?
You don't have to? I'm giving you the floor if you want it.

SORENSON: That's true. I know Rosaline had some questions about that. Sorenson has been involved in numbering for a substantial amount of time, we eventually started rolling out with 800 numbers since we could feasibly do that, we were doing this before local numbers were given out. Trying to provide additional functionality and capability to our customers. And so when local numbers came out, Sorenson obviously started focusing on supporting the FCC and the regulations there and rolling out local numbers to their customers once that was defined. You know, meanwhile, we have continued, as what we thought was a service to our customer to provide 800 numbers as part of that. And you know, still believe that they should have that option. It's only recently the FCC has made it clear that that should be a request of the customer rather than we have provided them as part of the package early on.

So we're working to change that through the system so we can support the latest order. Again, our view is that 800 numbers could continue to be supported in essentially the way that the FCC has suggested in the most recent orders. I'm not sure what additional clarifications Sheri's asking for.

KAREN STRAUSS: I want to understand something a little more. I did not read that order to require —— let me wait until —— I didn't read the FCC's order the require that consumers request numbers, that's number one. I read the order to say that the numbers can not be entered into the database, the ITRS database, Sorenson has officially and formally submitted a document to the FCC supporting the FCC's order. So, although Sorenson is coming in today saying that it supports 800 numbers, it's only supporting 800 numbers within its closed system. And that's really what this is all about.

I mean, I see two problems here. Number one, your a system where one provider has forced, essentially forced consumers to accept 800 numbers, and I think that most everybody in this room is not in support of that. And I don't think that anybody in this room wants 800 numbers to supplant ten—digit numbers. But on the other hand, we have a system where the FCC's order has taken away the ability of legitimate deaf businesses, or consumers who may want or need 800 numbers for whatever purpose to be able to use those numbers on a functionally equivalent basis, with full interoperability, as required by the FCC's 2006 order.
And the way that order stands, what it does is, it allows 800 numbers to basically continue for Sorenson. Because Sorenson still has approximately 80% of the consumers as a default provider.

And so, those numbers for point to point will continue for Sorenson. But they will not continue for point to point users trying to call into Sorenson users or between other providers. And that's what the problem is here.

BILL DEVER: Right. The commission is aware of the various policy and technical issues associated with the 800 number, the clarification order in August was a follow—up. It was not a order, but it was a public notice restating that the 2008 orders that were issued by the commission were directed toward putting geographically appropriate ten—digit geographically appropriate numbers in the ITRS database. But we stated that people could have 800 numbers.

KAREN STRAUSS: Clearly you were not the only ones that interpreted the ways that CSDVRS and the consumers, and all the other providers interpreted it, that 800 numbers could go into the database, and Neustar was already entering numbers.
Neustar was allowing those numbers to be entered into the database. It's a difference of opinion.

RICHARD HOVEY: It's not true that all the providers —— because we actually cited to one of the provider whose had said, if you look in the footnotes that one provider said that 800 numbers should map to ten—digit numbers, and we cited that. It was a provider's comment. We didn't make this up out of thin air.

KAREN STRAUSS: The ruling that the numbers would not be allowed to be entered into the database was not in the June or December order. Let me hand it over to somebody else.

BILL DEVER: First I would just like to say. I think that we could actually bogged down and talk about issues that everybody already understands are on the table.
I say that we recognize that these are the policy and technical issues that are out there that have to be resolved soon and that we move on to some of the other issues that people are concerned about. And I know that there was a concern about call—backs using geographically proximate numbers or 800 numbers, is that still a concern?

GEORGE SUITCLIFF: I'm with Purple. A couple of things, not to belabor it. Richard, I think some of the question and confusion is what database and what ten—digit number and what definition the people are using. The requests I believe from the consumers, and that toll free numbers that are in the ITRS as well as SMS and PSN, that they are mapped to numbers in the ITRS database for support. There's a lot of issues and policies, positions around it. We'll kind of just move on. But the confusion around that is ——

RICHARD HOVEY: Let me add another point. In terms of functional equivalent. If you look at the functions of the SMS 800 database, there is no way on Earth that the ITRS database can emulate those functions, only at the very lowest geographic routing level can they do it. But SMS 800 functions are vast and can not be —— in no way can they be replicated in the ITRS data base, it's just not possible. You can link the simplest basic functioning between the two.

BRIAN ROSEN: I also wanted to make sure that the providers understood that there's great

difficulty that we have, Neustar has been in dealing with 800 numbers, because there's no way to figure out if they're ported from one provider to another. Even if the relationship between the number and —— between the 800 number and the ten—digit number remains constant, unless —— if the provider changes the record for the 800 number would not be accessible by anyone.

BILL DEVER: I just wanted to state, the purpose of the ITRS data base, I think most people would agree is to set up a one—to—one relationship with a ten—digit geographically appropriate number and a internet address, URL, whatever you want to call it. And the concept of creating a one—to—one relationship between a ten—digit geographic number and a 1—800 number was a proposed modification that the providers had asked for to that database.

ELLIOT GREENWALD: I think the problem we are having here is one of definition. I think that the FCC staff is using the word "functionally equivalent" in a different way than the consumers are using the word "functionally equivalent". From a consumer point of view, functionally equivalent means that the person using the telephone or the person using the video phone can have the same type of service, the same ability, the same type of service. Whereas the FCC's staff is looking at functional equivalency in the form of technical routing of the call, that's not functional equivalence, it's interoperability, which you don't get if you can't put the 800 number in the ITRS database. And that is really where the difference is. We have to look at it from the consumer point of view.

BILL DEVER: That would be a policy reason for making a change, and we have that before us. I would suggest that we move on.

MIKE JACOBS: I think it's time the switch gears. Thank you all for the very thorough discussion on that. Al, why don't you start talking about call—backs.

SHERI FARINHA: Can I make a call before we go on. It's related to call backs, I have a big concern. I need to ask a question for clarification, please, before we close that 800 topic. Michael, or Greg, or whoever it was that was saying, meaning, if I as a ten—digit local number user call a deaf business that has a 800 number, will it go through? It will, correct?
» It depends on who your provider is.

SHERI FARINHA: Do I have a response?

GEORGE LYON: It depends.
It depends. If the 800 number is another deaf customer and that deaf customer is with a provider different than you, then, no, the call will not go through under the current FCC policy.

SHERI FARINHA: Okay. All right. Well, wait, I'm not talking about a deaf user, 800 number like the basic phone number. That's not what I'm talking about. I'm talking about the user has a ten—digit number, local number to call each other. Okay, I know that. I'm talking about those who are users and they purchase a 800 number for the their deaf business, that they have

established. I'm a user, okay, I want to know more about this business. And I'm going to call from my ten—digit number to that 800 number of the established business.
Will that work? That is my question under the FCC? Will that call be established.

GEORGE LYON: The answer is, no, if you have two different providers. Because your provider will not know where to route that call to the 800 number. It will think that it is a PSTN call and will route it up to a relay provider and then try to go to the SMS database, and the routing will not work.

MIKE JACOBS: I really think we need to move on from this 800 number issue to the call—backs issue.
Al, go ahead.

AL SONNENSTRAHL: Okay! 800 numbers are a very important topic. And we need to make sure we don't forget that when you come up with your resolutions. It's important to make sure that functional equivalency is maintained. Regarding call—back numbers, I believe there's some confusion about the call—back issue and the terminology that's used. Neustar says you can call back. But between the 911 center and the relay center, let me back up for a moment.
If a call is being made through relay, there are two lines involved between my video phone, there's one line from that to the relay center. And then a second line from the relay center to the 911 center. And the line between the relay center and the 911 center can experience a disconnect. And if that happens, you can call back to the relay center. But what about the leg from the relay center to my video phone? What happens if that portion of the call is broken? Can you then call me back at think video phone? The rules say that the interpreter can not call back to the consumer. So can the relay center call me back if that piece of the line is broken in an emergency situation, of course.

And can that happen if those two legs are not on the same platform? Do I have to call back to the relay center myself and get the same interpreter? Or will I get a different interpreter, which is what some providers tell me will happen, or can that original interpreter call me back so that we can reestablish our connection? There seem to be no standards currently in place. I think this is a very important issue that needs to be resolved.

ED BOSSON: If you don't mind, may I speak? I'm with CONVO relay, as well as the telecard alert, as the tent card said. Let me think about what Al just said. If I'm a deaf person experiencing a heart attack, I call 911, I can imagine for whatever reason there's a internet disconnection between myself and the relay center, I'm having a heart attack and I can't do anything. Would the interpreter be permitted to call me back. Just to give you a real life situation.

AL SONNENSTRAHL: Some say they can and some say they can't.

JIM HOUSE: I'm repeating it. Some providers say they can do such a thing, some providers say they can not.

MIKE JACOBS: Anything from the providers. It would be helpful to know if this is a technical problem. Is it a rule violation? What's the issue for clarification?

GEORGE SUITCLIFF: Technically you can capture that on the IP address of the incoming consumer, you can call them become, I don't know the platforms of that everybody's using. I don't know if it's kept at the station. Definitely the PSAP operator would be aware that the call has been dropped on that leg and would be asked to be reestablished as well. Either do that same CA or interpreter or could be calling back based on the number they get back through the relay or that has been transposed through that consumer. They should be able to reestablish.
The question in Ed's example, hopefully the consumer can answer the call, right. But ideally, this consumer's already registered, we've already gathered the local information and are dispatching at that time, hopefully through PSAP.

JOHN HARRIS: We have similar functionalities, in terms of Purple in being able to call the consumer back.

GEORGE SUITCLIFF: I'm not sure of the regulatory concerns.

RICHARD HOVEY: You're capturing the source IP address ——

JOHN HARRIS: Correct. Mark: With SNAP, we can do the same thing. We can reestablish either of the legs as well on a 911 call.

MIKE JACOBS: Three providers said they can reestablish the link.

AL SONNENSTRAHL: Yes. As I look around the room, there are a lot of young kids, or at least so they seem to me here. And in the history of relay service, the call back function was initiated just so you know, for some of the kids in the room who may not be fully aware of the history of this situation with VRS call backs, the rule was established because at within time there was one provider who could make a 911 call for you, but the wait time to get a interpreter was quite extensive, so therefore the rule was established.

There was again a very long hold time for that specific provider, potentially as long as a couple of hours. So that one—provider decided to do a good service to the community, rather than keeping people waiting for such a long period of tie time, and rather than expanding the interpreter pool, they set up a call—back system. This was back in the old days.
So myself, I could make a call, if an interpreter, if it was going to take me a long time to get an interpreter, I would say, call me back in four hours, that interpreter would call me back four hours later and I could complete my relay call. That practice created more confusion. The FCC established a rule saying that a provider could not call back to a consumer, again because that one specific provider didn't want to increase their interpreter pool to reduce their hold times.

Now, under the emergency rule situation, or excuse me, the emergency call handling

requirements situation, we still have that rule on the books, that's what we're discussing, can that rule be suspended, so to speak, only in emergency situations to allow that interpreter to call back. Second, VRS providers platform don't always support the function of calling back, we've had three providers in the room say, yes, we can call back to consumer, yet there are some that have not yet responded, I'm guessing that call—back feature may not be available. I would say that all providers should be able to call back to the consumer in a emergency situation if that leg of the call is disconnected.

JEFF ROSEN: I think this might be a good time to clarify the rule. We have some attorneys here from —— Tom? If someone could from the FCC could clarify the rule regarding call backs, I think there maybe some confusion. That might help our discussions.

TOM CHANDLER: I'm with the FCC. I think there's a couple of different call back issues here, but let me just respond to one, unfortunately I didn't bring the order. I think what was initially raised I think it was January '05 or January '06 we did a marketing practices PN, that addressed the call back practice that I think Al referred to. But that was in the context of where a caller is trying to initiate a VRS call, you're trying to make a call, there's a long wait time, you don't want to wait, they somehow capture your information, and then they would call you back and then you could initiate your call.

I don't believe although I'd have to check, that that marketing practice as PN addresses the issue we're talking about here which is where you have a already established call, if it's a emergency call in a more important contention, then during the call, it's disconnected and you're calling back to reestablish a call.

So, I don't think Al what you referred to earlier, this earlier rule really addresses this situation.

DILL: From Sorenson, we can reestablish connection to the PSAP also. Tom, I think it's the June order, the FCC made clear that if emergency calls are disconnected then the providers are ordered to reestablish the connection. So I don't think there's a regulatory issue. I think the FCC's already distinguished this from the other call—backs.

SHERI FARINHA: Can I get a chance after her.

ROSALINE CRAWFORD: I think one of the other outstanding issues after call—backs are the call—backs from 911, for providers to be able to identify that these are in fact call backs from 911 centers trying to get reconnected and being prioritized. I'm not so sure that that's still a problem. If the call is disconnected, unless the call is disconnected between the video interpreter and the PSAP, at that point, the PSAP is no longer connected to the video interpreter and does need to call back. How are those calls being prioritized so that they get answered first? So that they get put at the top of the queue. And I don't think that technologically we have resolved that issue. And quite frankly, I think this is the issue of critical importance because, it is related to 911 and safety issues.

MIKE JACOBS: Before you jump in, why don't we get a response to that from the providers?

SHERI FARINHA: I don't need to, actually that was what I was going to discuss, exactly what she brought up.

JOE: I'm from Sorenson. We dealt with a variety of issues dealing with 911. We're on the public record expressing that our goal is to —— once a customer makes a 911 call, we prioritize all in—bound calls for a certain period of time, we worked with NENA and so forth to try to determine what that right amount is. You know, how long it should be. It's not an extended —— too long of a time, but enough that we have confidence that the criticality of the time frame has passed. And so that's Sorenson's approach to that.

GEORGE SUITCLIFF: I'm with Purple. As Joe mentioned, this has been —— we talked about it earlier. Many of the providers have been discussing regularly several of these issues, Purple does the same. I believe several of the others have looked at or done similar to this prioritization efforts.

MIKE JACOBS: I just want —— Mike here. I know Purple has a petition in on priority cuing of PSAP call backs. Is this the same?
Is this resolved? Are we talking about ——

GEORGE SUITCLIFF: I'm not sure which one you're referring to on which petition you're looking at. On call—backs from PSAP's, of a disconnected 911 call, we have developed a system that prioritizes those calls from the voice side for a period of time.

Phone: Good—bye.

GEORGE SUITCLIFF: I don't know if this is the best solution, but it's the one that works without a broader, some way to do it.

MIKE JACOBS: Someone had a hand up in the corner?

RITA BIER: I'm from Purple. I want to make clear for anybody listening that may not be clear. I understand her question about being disconnected from the PSAP and if the PSAP need to call back. I also want to make it clear that in the VI is still on the phone with the customer, we will immediately try to reestablish an outbound call to the PSAP, we don't just let that remain disconnected. We've built this functionally if after the fat, the PSAP needs to call back. But in the moment, the VI's going to do everything they can to reconnect to the PSAP. I just want to make that clear.

ED BOSSON: I think that there's another issue in terms of education. If a deaf person places a 911 call, which is in turn routed appropriately, and that call disconnects between the interpreter and the deaf caller, the deaf person may try to make another call, while that call back is happening, right. So, if we look at how 911 functions today, the system will always call back.

Maybe we need to do some outreach and education to our deaf consumers about how to work with 911 and if the call disconnects, wait for the call back. But this is something we need the think carefully about.

RICHARD HOVEY: A slightly different question in this area. And that is what about the education of the people at the PSAP's, there are more than 6,000 PSAP's, we're curious about what the experience is of them being familiar to this service.
A lot of organizations try to reach out to them through NENA and ourselves. But what is the provider's and the users experience of the PSAP's handling these calls. A lot of PSAP's don't like to particularly handle VOIP calls, these are very similar to VIOP emergency calls.

» KELBY BRICK: I'm from Purple. Many providers here have been working with Neustar, actually for several years —— sorry, with NENA for several years. And specifically Richard Ray from California has been leading the fight on developing standard practices and that type of thing. And there's actually quite a thick document that has been developed in working with PSAPS, many of the providers have gone to the NENA conferences, given presentations and sat on panels, those guidelines have been distributed to various PSAPS. Could it be better? Absolutely, there's always improvement in different areas. But NENA is heavy involved with this development and is pushing the industry for establishment of practices. Many of us in the industry are working with NENA currently.

I don't want to necessarily, I'm not as concerned ant that particular issue, because I do know that NENA, under the leadership of Richard Ray and NENA is very active on this. So I am personally less concerned about that particular issue.

ROSALINE CRAWFORD: Are we ready to change subjects?

MIKE JACOBS: I think so, ready the change subjects.

ROSALINE CRAWFORD: Okay! I'm going to T—up another one. The next subject that I would like to put on the table for discussion and hopefully for some resolution and urging and advocacy here related to allowing within the ITRS database numbers for people who can hear but do sign and have a video phone. And they need to be in the ITRS database in order to be connected with their deaf and hard of hearing loved ones, family, service providers and whatever. We need to be able to assure that we have connections between these two groups of people who can communicate directly and do not otherwise require the services of VRS. And to require these individuals to use VRS when they don't have to, it just doesn't make sense. So I am urging the commission to respond to the matter that is on the docket, has been on the docket for awhile. And to do so in a positive manner.

MIKE JACOBS: I think that that's enough on that issue, frankly.

RICHARD HOVEY: Actually, one issue on that question which I asked a number of times. How many people are we talking about?

How many —— what is the number of hearing people who know American Sign Language that will fit into this category?

ROSALINE CRAWFORD: You know, I wish I had control of the United States census to be able to give you a figure of how many people in the United States actually use sign language. And the United States census does not collect that information. And there are estimates of anywhere between 500,000 to 2 million people.

RICHARD HOVEY: That's fine.

ROSALINE CRAWFORD: But what we're talking about here are 95% of people who are born deaf are born to hearing families. And to the extent that these families sign, boy, they sure want to keep signing to each other from a distance too. Same thing with professionals, interpreters, who really want to communicate directly with their deaf clients, and service professionals, and mental healthcare providers. A huge range of people who can have the ability to communicate with each other really do need to.

MIKE JACOBS: Your point's well taken. Rich, I think Rich's question is a very good one, we are trying to focus more on data, that was a very helpful answer. We appreciate it. Do either over you have anything —— further espousing her view? Let's turn to Jim, first.

JIM HOUSE: Every year TDI publishes a directory. In this directory, there are over 30,000 listings. Some of them are deaf people, some of them are businesses who serve deaf people, reason by deaf or by hearing folks. There are government agencies, state agencies, so it's difficult to put a hard and fast number on some kind of level of who would benefit from direct communication. It certainly would improve their services. And it would save the TRS fund.

MIKE JACOBS: Point well taken. I think her answer covered that, Elliot.

ELLIOT GREENWALD: Just as a general point. I was very troubled by Richard's question. The reason I was troubled by it is because the ADA is not about the number of people who need accessibility. The ADA is about because there are people who need accessible. That's where the FCC should be coming from. But if there are people who need accessibility, they should get it.

AL SONNENSTRAHL: I agree with Elliot's remark. That it's not about numbers. The people in this room right now, let's see, we have three interpreters, a couple of folks who don't know sign language, who are depending on those interpreter, at this very moment for what I'm saying, still, I can't call these people directly. They know sign language, I can not call either, any of these three people, they don't have ten—digit numbers. I have to call another interpreter to talk to these interpreters.
Come on. Is that feasible? Is that meeting our rights? I think not.

KELBY BRICK: More and more individuals are really becoming concerned about this, because we do have the November 12th deadline that has a hard impact on this issue. I'm sure you saw

the letter on the docket from I believe it was a hospital in Philadelphia who was very, very concerned because they have deaf patients there on a regular basis or visitors, and the November 12th deadline is coming up, how can they —— their deaf patients make phone calls because the hospital owns the equipment, they're hearing, they can't get a phone number, therefore these pieces of equipment are locked out from relay from November 12th. The FCC needs to provide guidance, instructions to schools, hospitals, mental health agency to tell them how they can —— how their video phones can become accessible, because they right now can not get phone numbers. Hospitals have contacted us to get phone numbers, we will not as Purple give them a phone number, even though they have deaf clients that come in. They're hearing, we can't give them a phone number because we'll get in trouble with the FCC. We're in a catch—22 situation. The FCC must give guidance on what to do with those individuals. I'm also puzzled if you don't mind Michael to specifically provide clarification, Rosaline brought up this question, you said, we already had enough on this let's move on. I got here a few minutes late, why did you —— we can't go any further, that's enough.

MIKE JACOBS: What I meant to indicate was that we have a lot on the record on this. And that, I don't think this is —— this is certainly a important policy issue. I don't think it's so much of a technical issue, which is what we are were hoping to drill down a little more on. I think we've heard the viewpoints on this. We understand it's very important. We have a lot of paper on it. That's all I was saying. If anyone else has anything to add on this particular topic, fine. If not, let's move on.

JEFF ROSEN: If I may, I will be very brief. Just by way of information, there have been a number of comments about hearing folk whose are trying to get numbers through deaf people. And there are federal agencies, locally to whom we can not assign a number say to their coordinator of interpreting services in a given federal agency. This person is piggybacking on another deaf person's profile to fudge a number. It's not a good practice, whether a company wants to cooperate or not. The video phone in the lobby of the FCC that's open for the public can not get a ten—digit number assigned to it.

You have to find a deaf person, located here, even though they're really not tied to that machine, to loan their profile to it. I think this is a kind of urgent issue. We're going to have to add some emphasis on this.

MIKE JACOBS: The fact that I wanted to move on was not a commentary on the issues. It's a time management issue, that's all.

ROSALINE CRAWFORD: Ready, ready to move on?

MIKE JACOBS: Ready to move on.

ROSALINE CRAWFORD: I appreciate you taking note of our request. And we certainly hope that you can issue a appropriate ruling on this issue well before November 12th. Because everybody who's out there waiting for you will need to actually register prior to November 12th.

Let's pick another subject. And the one I'm going to pick next is pass—through of video phone numbers or caller ID that should be required for all VRS calls placed through the default or other VRS providers for everybody. We understand that VP to VP and other kinds of calls, the caller ID information isn't coming through. And it needs to. And I just don't know whether this has been resolved. Is it a technical issue? Can providers kind of bring me up to speed?

JEFF ROSEN: This is a Sorenson problem. I think Sorenson should start as an answer. I'm going to ask Sorenson to take the lead on this one.

MIKE JACOBS: Kent had actually raised his hand—

KENT CHARUGUNDLA: We do support caller ID pass—threw on both sides.

JOE: I'm from.

SORENSON: You know we have been in this business a long time. We implemented a method a long time to pass through caller ID responses, as we moved to numbering systems we looked at it as a interoperable scanner, we presented to it the provider community, they looked at this as another detail between how phones interoperate from providers. We have been looking to get approval on that standard. When that happens, to implement support for that standard including caller ID as part of that.
Currently as everybody knows, the industry has questioned the need to port phones ——

SHERI FARINHA: I have a question.

MIKE JACOBS: Hold on, Joe is in the middle of answering a question.

JOE: we've been looking for approval of standard that's currently from providers whether we want to actually port phones or not and other providers have strongly petitioned that we shouldn't have to do that. Because of that, that standard has been kind of set aside for now. Meanwhile, Sorenson has had the plan that when we have the standard to support that we would also support the caller ID we discussed as part of that standard.
That answer, the portability of phones and the standard should be addressed by providers but also by the FCC to clarify where we stand on that.

MIKE JACOBS: Why don't we let Sheri say something, then we'll turn to George.

SHERI FARINHA: First of all, I'm very frustrated with this conference call because, I can't see who's speaking. I'm not sure who's speaking all the time. And I'm not trying to be an arrogant person and interrupt all the time, I'm sorry, I'm not. I want to ask about —— we were talking about caller ID. When a hearing person calls me, and I have a missed call, what shows up on my screen is the interpreter, the Sorenson interpreter, it shows that I have a call from Sorenson, and that's not good. Because I want to know who called me. I want to know who that hearing person was that called me. I want to know what their phone number is. That's what I want to see. I

don't want to see a Sorenson interpreter called me. That's my point.

MIKE JACOBS: I think it was George's turn.

GEORGE LYON: I'm from Purple. Joe, I just don't understand your answer. Is it that you can't provide caller ID the way everyone else does because you don't have a porting standard? I don't see the connection between those two. Because everyone else is able to provide caller ID. But Sorenson doesn't.

JOE ROMRIELL: So I thought I made it clear that when we wrote the standard, we actually discussed how caller ID could be implemented. And as part of that kind of in our technical planning, a plan that has we implement the standard will also implement support for caller ID. We're looking for generalized support for a standard of how phones should interoperate with providers. If other providers aren't willing to support the standard, it's delayed, that fact has delayed implementation on that side. Could it be separated. Yes, it could. It could be separated from the standard. But that's why we are where we are. Because we expected that to be apart of that process.

CATHY SEIDEL: May I ask a question on that one. To the extent that they were separated. How long would it take for something that like to be implemented based on where you are today?

Sorry, Cathy Seidel.

The implementation isn't overly complex. For us it's always the roll—out to all of our customers, the testing and roll out of it that would take the additional time. So I would say medium on that.

JIM HOUSE: I have something related to caller ID I wanted to talk about. If one uses different devices and all kinds of numbers come up with names assigned to them on the caller I D, I think you're going to have to have the capability to pass—through both pieces of data.

JEFF ROSEN: I would like to ask the FCC if you're aware the major impact that this has on deaf consumers, this very issue. Do you mind stating —— I know, time is very precious here, but do you want to hear more about the impact? I mean, from all of us as well as Sorenson's consumers, are you already aware of the level of impact that this has, or would you like to hear more in depth about that?

MIKE JACOBS: I know personally, I feel aware of it. Does anyone else want to hear more about it? I think we're fine on that score.

Phone: BRIAN ROSEN: I would like to point out something that would be possible. I'm not arguing that this is desirable. But I'll take out on Joe's notion is that the problem is not technically difficult but it's the operational rollout problem. Given the reserve look up

mechanism that we have in the data base, it's now possible to know what the correct telephone number that should be used by the device would be. You can go from the IP address to telephone number in the database. That means that the provider, regardless of what the device does could put out credit caller ID.

JOHN HARRIS: I'm with CSDVRS. I understand that feature's there. That is absolutely not the best information. The best information is going to come from the device. The device knows what local phone number has been assigned to it. The only time that does not take place is with a D—link or another video conferencing device that's being used for relay that wasn't assigned a local number and is not controlled by a VRS provider.

BRIAN ROSE: It is the best, but as a practical matter, it would be much faster to rollout.

MIKE JACOBS: You broke up at the end there. Can you repeat.

BRIAN ROSE: From Neustar. I believe that it's better to do wit the device, it's the right way to do it. I'm usually in favor of the right way. And I wouldn't want to stop the effort ——

SHERI FARINHA: I need to stop you from a minute, I'm still getting it as garbled. I guess it's some kind of technical problem going on.

BILL DEVER: Just to state that Brian was saying that, he agrees that the best information comes from the device, and what he was proposing as a work around was a second best.

BRIAN ROSE: An expedient to get it out right away.

GEORGE SUITCLIFF: Testing roll out is a challenge. Anytime you're doing rollout the right way to go is using technology standards that's out in the getter knowledge for these technical devices. Brian, I appreciate it, but I would rather not go down the path that would rely on a temporary solution that we all agree would be maybe not the best.

JOHN HARRIS: Just one more point. I believe, and Joe, you can correct me if I'm wrong, the caller ID is already passed in the signaling of your device, it's just not in a standard location, where others who utilize the standard for video conferencing can pick up that information.

JOE ROMRIELL: I made the statement earlier that we implemented caller ID within your devices a long time ago utilizing you know, an approach. Actually, the mechanism used in 323, right now, it's kind of clear that it should be used for caller ID but if you looked at the history when we got into this business, that bill wasn't so clear six years ago.

RICHARD HOVEY: I have a slightly different question for the providers related to caller ID, many subscriber, hearing subscribers in particular, subscribe to a C—name service, they get the calling party name and not just the number. And you know, you pay $8.95 to Verizon, that's more prevalent than just seeing a number. For hearing customers, those names have to be

pushed back into the C—name databases, which is another part of the phone system. And my question is, do you push —— when you give a user a phone number, do you also push that number back so that if you're user calls another user that the name is actually there for lookup purposes?
Or do you just go by numbers, basically?

GEORGE SUITCLIFF: We're not a telecom provider, so we don't have direct access.

RICHARD HOVEY: You would have to push it there your numbering provider.

GEORGE S : Yes, my understanding is that those numbers are loaded in C—name.

RICHARD HOVEY: With a name?

GEORGE S: They should also have a name, yes.

KAREN STRAUSS: S I think that this kind of leads us to one of the issues that was brought up this morning that we still haven't discussed, we only have ten minutes, that's the porting issue.

MIKE JACOBS: Yeah, I think you're right. Would anyone —— I think we would be amenable, we're on a roll here, I think we could maybe move this to 4:30, —— well, if you're not amenable, just leave, but we're going to continue on that path.

KAREN STRAUSS: In any case, it still does kind of segue way.

MIKE JACOBS: It absolutely does. I want to establish that.

KAREN STRAUSS: I think that's what's happened. Sorenson has kind of held up on providing caller ID, pending what's going to happen to their porting or —— I think you refer to it as your interoperability standard. So I think it's worth having a discussion on that, because there's clearly technical issues.

MIKE JACOBS: Absolutely. Before we move on to that. Is there anything else strictly related to caller ID that doesn't segue way into porting.

BILL DEVER: I wanted to start on porting, just by trying to get a sense of what is the impact on November 12th of not resolving the porting issue? Which only you're under a one—year waiver until the end of the year, making somebody else's device do all the things that it's supposed to do. So what is the consumer impact on November 12th of the existing impasse on porting?

ROSALINE CRAWFORD: I'll let me colleagues also jump in. Particularly about the impact to November 12th. The consumer position has generally been that we'd like to be able to have our choice of video phone and have our choice of VRS provider. So that I can use the equipment that meets my needs, and then choose whichever provider I would like to have to provide my

service based on quality of service, blah, blah, blah.

That was our starting position. The FCC in the order said, well, it seems like a compromise, well, you know, we heard you, we really did, that you want to be able to use devices with other providers, but the compromise is, we're going to order providers to give you a black rotary dial analog version of a video phone, one that only requires the capacity to make and receive calls. And you can't do anything else with it. Which doesn't meet our needs, quite frankly, we're talking about one the highest levels of technology available for communication today. Video communication. And to reduce us down to bare bones when there's so many capability within the technology does a disservice to us. So in our last set of comments, we caved. We gave it up. We basically said, we don't want it. We can't use it. It's not desirable. Get rid of it.
We are going to be in a position requesting, quite frankly that you waive the requirements completely for VRS providers to make their video phones operate at any level so that consumers can carry them provider to provider. And we understand that that relinquishing of that desire means that consumers, when they port their number to a new provider must also obtain new equipment. We don't think that's in anybody's best interest accept for the VRS provider.
But that's what we've decided has to be our position because, basic call functioning is not desirable.

And my colleagues are welcome to add their comments.

JEFF ROSEN: Just very briefly. I'm trying to answer your question getting the relationship between November 12th and the devices. For people who have devices, to only have numbers that apply to their device if there's a default provider, they feel like there's no flexibility to get a number from anywhere else. Because they'll lose the functionality in their device. If they port, then they'll lose everything. So there's a lot of confusion among customers. Secondly, there's a lot of concern about whether you can have only one number per device. I have a VP 200, because I think most people do. But if I don't want to use Sorenson, and I want to use someone else, do I need a number from some where else? I'm not sure if I can. Because I'm in the sure how it will affect the device.

There seems to be a strong relationship between the device and the number associated with it.

JIM HOUSE: I'm from TDI. In the long run, the device I think should be independent from the service provider, as a example. If someone who is deaf-blind, maybe I need a very, very, large monitor. But, for whatever device I've chose the monitor's very small, so it doesn't work for me. And I jump to another device, where that —— that allows me to plug it into a television screen, which will best meet my vision requirements, or maybe I want one that's portable. Maybe I want something that's stand alone. People have various needs, unfortunately, there's not one company that can meet all those various needs right now at this point.

KELBY BRICK: With all due respect to Jeff and others, I do not really think that the porting issue has a direct impact on November 12th and that deadline. My reason for saying this is that porting, to port you must have a number. If you don't have a number, there's nothing to port.

There are several other issues that obviously need to be resolved before November 12th. So back to your discussion, does it really have an impact on the November 12th deadline, personally, I don't see a relationship between the two—

JEFF ROSEN: I have no problem with that.

KAREN STRAUSS: I'm from CSDVRS. While it may not have an immediate impact on consumers on November 12th, do I think that there's a lot of consumer confusion. And the distance between November 12th and December 31st is not that far. I think that consumers need to understand what's going to happen to their equipment. It may make a difference in who they get a number from for example. And also, if there is not a waiver of the porting requirement, then providers need to know that now, not on November 12th. They're not going to be able to get the system up and running in six weeks.

So I think that it's a very timely issue. I don't think that we can ignore it. But I'm more concerned about the confusion. There's immense confusion among consumers about what happen to their equipment.

BILL DEVER: That raises a question that I was wondering about and maybe people would know the answer to, which is, do consumers have a good sense that once they get a number from a default provider they can move it to another provider after that? I've seen some of number portability the way a lot of hearing folks would think that you would move your number from one cell phone to another?

KAREN STRAUSS: I think the consumers again are very confused because, there's no consistent information being give on the them. Right now there is a —— you can port your equipment provision in the rules. But no one's really telling them about it. Because we don't know if it's going to go through. They're very confused about porting their number, and again, what that means. So I think the answer is, no. Do consumers understand, they may have some general notion that they can transfer their number, but they don't know what goes with it, I think. I'd like to hear from the consumers more. But...

AL SONNENSTRAHL: I'm representing the consumers. I agree with what Karen said. There is a lot of confusion. As I mentioned this morning, there's one organization, VRSCA that's done a fantastic job. They've done town hall meetings explaining lots of matters. They're a research group. They promote information and try to remain neutral. They use the VP 200 as their model. But they say if you want another provider as your default provider you will lose these futures in the VP 200. That's true. When I look at and see people's faces, they seem to be afraid. So they keep their VP on a ongoing basis. Because they don't want to ask another provider. They want to keep their VP 200.
» They say they will have no one to fix their box if something happens. So I would say that there needs to be some publicity on it, some education on it. Because consumers seem to be generally afraid.

SHANE FELDMAN: I'm with the National Association of the Deaf. By the way, a excellent question, in answering it, really who is educating folks? You're competitors. They're interest, really are not importing numbers. You have to understand, that they're not their main interest. Their interest is to get ten—digit numbers to everyone so they can become their customers. That's their interest, specifically until November 12th. After November 12th. You might see some competitors, or people trying to port to competitors, because again, people have to get a number before they can be ported. So you might hear more about portability after the 12th. And as Sunny said, there's some fear, because some people fear they will lose their feature, some she they will lose their device. But this has to be more visited after the 12th. Providers have no interest in educating consumers about porting because they'll afraid they'll lose the customer.

BILL DEVER: It sounds to me like a important consumer education piece would be, no matter what happens with porting, a consumer after November 12th who gets a number after a default provider can go to a new provider, new device and keep the same number. It sounds like maybe that consumer education is not happening.

JEFF ROSEN: Thank you. I think this maybe related but on a different issue, actually. Regarding cell phones. Many people can't get devices, because there's a long waiting list for a device. So they use a softphone, that has come on to the market now. And it's one solution, but it's kind of sad, because there's a lot of confusion about how the rules apply to those phones. Are they the same as a hard device? Are they required to accept the same responsibility for those devices? From my experience with consumers out there, most smart phones that are on the market are provided urge some are provided by VS providers, others not.
They're not fully interoperable. It's a tough situation. How does everything connect together is not clear. There are a lot of technical issues involved with these devices. I think these devices and issues related to them are on our plates at this time, too.

KAREN STRAUSS: I want to just answer your question also about consumer confusion. The other piece that consumers aren't being hold is that, and again, this depends on what you decide on porting, but if you do eliminate the equipment porting rule and consumers just can port their number, then they also need to be told that they can keep their equipment and still dial around. And there is confusion about that.

Because some are suggesting that misinformation is being given out about that. So it's another whole piece. They don't have to give up their equipment. Even after November 12th goes into effect. They can keep their default provider, they can dial around. So it's important for them to know that.

SHERI FARINHA: Hi, everyone. One question that I have is whether or not it's possible for all providers at anytime that a person who might be using video relay services —— anytime a person is using VRS to make calls or using IP relay, either way, whether they can make the calls and whether or not the system that you have will automatically prompt you if it doesn't recognize your phone number. Will it —— say you get a phone number before prefacing your call —— Kelby brought this up this morning, wondering whether it was a emergency, will a

prompt say, is this a emergency? Whatever. The point is whether this would be possible among all providers to allow a call by a number, that a system might not recognize. Will the system prompt you that it doesn't recognize your number?

GEORGE SUITCLIFF: Regarding a 911 call, will the CA or VI will prompted as unregistered. Is that your question?

SHERI FARINHA: What I was talking about is whether before November 12th —— Jim House talked about this earlier. Suppose a consumer has a D—link or is using —— or hasn't gotten a number of use, or had some other form of equipment. But does not have a phone number in your particular system. Does your particular system have the ability to recognize the number and prompt automatically prompt you for the number? Or will the system be able to process the call once November 12th comes around?

JIM HOUSE: I think there maybe some confusion between the IP number and the phone number.

GEORGE SUITCLIFF: Let me see if I can answer Sheri's question, if it's the same, Jim. Our systems, and I can't speak to everybody's here. But on the IP relay, as well as VRS, an incoming call, we do try to query our data bases as well as the Neustar database to identify if that caller's registered or not. If they're not registered, we are able to prompt the caller or through the CA or VI or IP relay, also through text and the messaging and things like that, and process the call appropriately.

Right now, try to get them to register and process a call, or post, you know, November 13th we would block.

JIM HOUSE: But what happens if I have an IP address for my computer for example. And I use the same AIM name on a different computer. I already have a number associated with my AIM address, if I use that AIM to go to another, what happens in.

GEORGE SUITCLIFF: The AIM handle on text relay if you're calling it through AIM would be the caller ID that we look up in your profile or in the database. So however you access what machine you use, your computer, Blackberry or whatever, if you use that same user name, screen name, we would be able to look by that number or name.

GEORGE SUITCLIFF. The problem is, a vast majority of our text customers are not registered, for the next six weeks, I don't see them registering.

SHANE FELDMAN: I'm from the National Association of the Deaf. What Jeff has brought up about the softphone, I think is actually a very important issue. I know there are many folks out there who have softphones, and they love them, they're wonderful pieces of technology. You take this little laptop and go everywhere, it functions almost the same as a stand alone video phone, you're freer with it. Now with the phone number, folks maybe under the assumption that

it can apply to that soft phone, just like it apply to a hard piece of equipment which is not the case. So on the softphone, they're actually losing their phone number. I think it's very important that the phone numbers will integrated in the softphone as well and the FCC needs to realize that type of technology and have it associated with the ITRS database.

JEFF ROSEN: And interoperability as well.

ROSALINE CRAWFORD: I just kind of wanted to segue way a little bit towards the interoperability question of resolving existing problems today of people not being able to connect with each other that's point to point when they use different —— when each of the users uses a different technology. And I'll give you a great example, and Jeff will forgive me. But I tried to reach Jeff a few weeks ago, and I had access to a Sorenson VP 200. And he was not using a Sorenson device, and it was —— I didn't even have to ask him.

JEFF ROSEN: It was a softphone.

ROSALINE CRAWFORD: I couldn't reach him and he couldn't reach me, that's just one example. I'm sure there are tons of others around there. I hope that the providers are actually working this out. But I'd like an update from providers in terms of how close are we to making sure that there is in fact interoperability here between devices communicating with each other?

RICHARD HOVEY: I would just say that, most of our focus historically has been between the provider and the ITRS directory and some of the back end. And the expertise of course is with the providers on these kinds of issues. To the extent that providers can explain to us, we are capable of understands some things if it's some explained to what the issues are with the soft phones, I'm sort of soliciting, if anyone wants to describe what the examples are —— not here of course, not in the context of this meeting, but we're more than anxious to learn these thoughts and issues in detail at a fairly detailed level.

KENT CHARUGUNDLA: I have an issue just going back to the previous question in regard to the portable for CPE device. The issue here is in regard to the older VP 100, 200 devices, which are with another divider. If you were to port them, portable of the ten—digit number is not a problem. However porting of the CPE device is a problem. The reason for that is, the mechanism to collect the device IP address is a problem because IP addresses keep changing by the cape provider. And if you're associating a IP address to the BTN, billing telephone number or the ten—dig its number, which is not the same, it's not constant, it's always changing. We're having a issue of how to update that with the ITRS the that base. We haven't found any solutions or got any answers from ITRS yet. That's an issue, we do not know how to move forward on that.

JEFF ROSEN: Absolutely.

KENT CHARUGUNDLA: This is a problem for November 12th.

SHANE FELDMAN: To tag on to the issue that Rosaline brought up. Within in the deaf community, there are stories about people who try to call another device and get disconnected. Personally, I tried to talk to Neil who works at TDI, he uses a different kind of technology, so I was testing it out to see whether it would work or not. The bottom line was. It didn't. But the functional equivalence is at issue.

GREGORY HLIBOK: Can I ask for clarification, when you say you couldn't connect with each other, using a ten digit number or an IP address? You could connect using the IP address.

SHANE FELDMAN: There remain problems with the IP address.

GREGORY HLIBOK: We've heard varying stories, if you have two different devices, my understanding is using IP addresses is not a issue. However trying to use ten digit numbers is a issue. I was just asking for clarification on that point.

SHANE FELDMAN: I'm happy the share with you about the nature of the test. It works on some devices and not on some others. The bottom line I think here is as a deaf consumer, we want functional equivalence with hearing consumers. If we place a phone call regardless of the technical tweaking and the routing that want to happen, we want to make a phone call. Whether it's on my local site, his local site, it doesn't matter to me, it should work out. The technology needs to be bumped up to where it's plug and play. If you call somebody, you should get a connection. Right now as it stands, there are serious problems among callers in the deaf community.

And I don't know where the fault lies, but you to identify the roadblocks, all throughout the connection of this call. And this process has to be bumped up to where it's functionally equivalent.

MIKE JACOBS: Why don't we let George go and then you, Al.

AL SONNENSTRAHL: Sure, sure.

GEORGE SUITCLIFF: There's many potential issues, one of the challenges as a provider that we face is the number of different devices or software clients that consumers may end up with either from a provider, someone sitting around this table, which is frankly, we know those people, we can talk to them many times and figure stuff out, or from the BestBuy down the street, based on the ITRS requirements are as a provider, I don't have the ability to completely manage my customer service.

Because they have to be able to be calling directly. Directly calling the IP address and manage all of those interoperability problems like a phone company would from the core of my network handing out to the other networks I'm facing. That's one of the pieces that would greatly help. This plug and play, this interoperability and improved service quality, is around what we call the server routing model.

AL SONNENSTRAHL: Thank you. Just a quick question. Does the FCC have a lab to be able to test various pieces of equipment connecting with each other?

MIKE JACOBS: Well, we do have an engineering lab in Columbia, they tend to deal with DRF though.

BILL DEVER: I don't think that we have a history of evaluating devices for that particular question. But is the capability there, technical, probably. It's just a question of whether or not that would happen.

RICHARD HOVEY: Under our rules of part 68 which control connection CPE to the network, you know, equipment that's connected to the phone network has to meet certain technical specifications, that's out sourced and done by industry and certified by industry and not done by commission. Industry gets together and they keep those specs up to date because they have the expertise that we don't that they can do that.

Now, the answer to your question is, no, we do not do it for video phones, particularly for video phones used by the deaf, to the extent that we do it for consumer CPE equipment. It's done by outsourcing to the industry. We're basically, it's kind of the last resort for dispute resolution. But we expect it to be more or less, you know, self maintained.

AL SONNENSTRAHL: Me? Yeah. In terms of that question, Richard, I don't know if you know from among the VP networks, it's a small part of the population, relatively low incidence group. And industry tends to focus their attention on the big market, don't they? So compared to what they could get from the VP market, it's very small. I think the results would not bare out to do some standardization of equipment. It would be nice if the FCC could create some type of service for low incidence populations, especially for deaf-blind, and those types of folks, that would reduce some of our unemployment problems as well.

KENT CHARUGUNDLA: I would like to hear from Neustar, NTRS in regard to the issue I raised earlier.

MIKE JACOBS: I think we're —— yeah, why don't we sort of wrap up this issue.

KAREN STRAUSS: Yeah, I was actually going to suggest wraps it up. I just wanted to comment. I wanted to add to what Sunny just said, actually as the FCC as an exception to the par 68 that you give to it the industry for hearing and compatible, it's exactly what Sunny said, the market doesn't address the needs of the disabled. This could be an area that the FCC would intervene, I would say we wrap up this discussion because it's part of a much greater discussion in terms of standardization of protocols and equipment to enable full interoperability and full functionality, I would just propose that we keep this discussion going at another time, but maybe close it for now.

BILL DEVER: I agree, I think that's much more of a forward looking issue. And we're focused on November 12th. I had one more issue on my list that we all T—ed up at the beginning of the meeting, that was the question of what is the magnitude of the D—links issues on November 12th?

KELBY BRICK: Okay. Again, I'm here from Purple. I really don't have the best answer, however I do believe it is part of a larger problem, specifically for schools for the deaf, government offices, hospitals, the like. They are stuck because they can not get a ten—digit number right now under the current rules, they are completely stuck.
And they also have no voice in this discussion. They serve consumers, but they're not consumers, they're also not providers. Those entities are everywhere, library, government organizations, hospitals, et cetera. That's really where I believe the problem comes in.

JIM HOUSE: If I recall, it was several years back where some VRS providers who are not present at this discussion, but they distributed a heck of a lot of D—link, that's been disbanded for one reason or another, those are out there. And there's lots of people who are not able to get other video phone devices. And so we have to ask about that distribution program and how many legacy D—links are out there.

MIKE JACOBS: Before you speak, I think John had his hand up.

JOHN HARRIS: I'm with CSDVRS. I definitely think it numbers in the thousands. If you're looking for a number. I think the limitations that they have —— one specifically that is one that needs to be addressed is that they basically can not dial 911. So in order for them to place a emergency call, they must dial an IP address, which for CSDVRS is 911CSDVRS.911. Because there is no facility in place for that device to record it's IP address, centralized facility, unless we know it, we really have no way to assign it a number and put it into the ITRS database with confidence that it's going to be accurate.

So that's a recall issue that needs to be addressed. You know, there are ways to mitigate the IP addressing. We've implemented that for the D—links that we're aware of. But because of other issues related to just the D—link, we do not feel comfortable assigning them a geographic local number. So we've assigned them an 800 number.
So I think in terms of how we walk into November 12th, we either need to decide that it's okay to give them a local number and register to be their default provider, even though we can't provide E—911 service specifically to the dialing of 911 or come up with a way to swap them out.

ROSALINE CRAWFORD: Which leads me to a comment I made this morning, and that is for —— because a lot of these folks need to be in the ITRS database but they can't be because they are deaf. We need to resolve that. And I am confident resolving that issue will then —— then providers will figure it out and be able to establish great cash for clunkers programs to trade those D—links for new equipment that they are currently distributing for free for a fee, whatever they do.

MIKE JACOBS: We're about 6 minutes left now. So is there anything else on this particular issue? I think Kent was sort of next in line.

KENT CHARUGUNDLA: I'm sorry, the issue still is, we have a problem in regard to porting a CPE device which is not able to register the 323 gatekeeper or any other form. We can not rely on a physical address because the cable companies do tend to change the IP address every three days. So we're looking for a solution on this. There's no proper direction from the ITRS on this particular issue.

NEUSTAR: I don't know if Brian is still on the call. He's really the technical person.

BRIAN ROSEN: I'm definitely on the call. This is all the same problem. This is —— there is no standard way that all devices and therefore, there's no agreement among the provider whose provide devices on how the device announces it's IP address to it's provider. This was part of the proposal that Sorenson put out in discussion with all providers which got stuck on the feature related issues. But it's a important issue. And the point being raised is related —— is another little thread that goes along, we have to have caller ID right, all devices have to do caller ID right. We have to announce the IP address, all the devices have to announce all the IP addresses in some standard way. Well, yes. Then we get down to, well, you have to be able to do speed dials, all devices have to have speed dials.

When you move your device from one device to another, you to have speed dials, well, yes.

MIKE JACOBS: You guys have plenty of Mondays to work on that, I guess.

KENT CHARUGUNDLA: This has to be resolved —— this is a November 12th issue.

MIKE JACOBS: This is a provider issue.

KAREN STRAUSS: But the porting you have to resolve. You have to tell the providers what you're going to do with porting.

JEFF ROSEN: Really one quick comment. It's not related to November 12th directly. There is a saturation in the market in the residence space. That environment is maybe a little more controllable. And now we're starting to move into the private business and government public entities, hospitals, other secured locations, and really there is an immense problem there with assigning phone numbers to those boxes.

And the network security folks, even in the government, where we stand, the issue comes up time and time again about proxy servers. And you can call it whatever you want to call it. But folks around it call it by any number of names, but the focus remains. Something that I would like to put on your plate. It's a huge challenge for deaf folk whose are employed in those access and have been blocked and can not even receive a device, it's an immense issue.

GEORGE SUITCLIFF: I would agree with Jeff and everything he's commented. And also say it will help in the interoperability topics. But we have one issue that we haven't —— we may have missed it. But we need the specifically address for November 12th. It seems a lot of this focus has been around VRS and those consumers. Who about those consumers that are reliant on other forms of relay, IE text relay, who are in the majority not registered and albeit all our best efforts, we aren't able to mobile them at this point to getting registered. That is a very real November 12th. I don't know if there are any other new ideas.

MIKE JACOBS: We discussed that this morning.

BRIAN ROSEN: Virtually all of the things we talked about that have to do with devices aren't an issue. However, several of the things we talked about having to do with 800 numbers and 911 and all those things are exactly the same. There is no difference. I don't think that there is a specific problem with IP relay or any of the other forms, IP relay's all there is in the database right now, but with IP relay, that is a provider—related problem that would be the subject of this meeting.
I'm not aware of one.

RICHARD HOVEY: We are familiar with this issue about government agencies, hospitals and the like and the security issues. But we're only familiar with it as an issue. And again, I solicit details on what it is that for example, the government agency is doing that makes it difficult, what the solutions are, of course there are various ways for video phones, standards video phones going through firewalls both for SIF, universities and the like. So we understand, we don't have a lot of information though on the practical issues about you know, you don't come and tell us that this is the way the government agency operates, and this is why they can't be given numbers.

We know they can't, because the government employees come to us.
But we need help. We need your technical input on these issues to better understand why you know, why we need to do something. We know we need to do something, but what it is, it's sort of technology—based.

KELBY BRICK: To be quite honest, I don't know what to make of the question or the comment. We will be submitted a filing for clarification, requesting clarification on proxy routing. We have addressed many of these issues from government agencies and hospitals, and all the firewalls that are out there. And frankly, if you feel that that's inadequate detail, then we would be more than happy to speak with you offline. I think that the document speaks for itself, and there's simply no standard to rely on.

There's such a bevy of Telephony out there, it's shocking that it is still a issue. If it is a issue. I'm happy to help you and your staff to get your arms around it. Is that what you're asking for, or is the document insufficient in terms of the engineering the description. I didn't realize that you needed further information on this point.

RICHARD HOVEY: If there's a document at the detailed protocol level that talks about whether

their using access control lists, what they're using for blocking systems, whatever, I haven't seen it. I've seen documents that say this is a issue, this is the solution we need to support that issue. But, maybe I'm just technically curious, but I like to understand how these are operating at the protocol level.
And that informs what our technical options and our policy options are.

We'll plan to come see you soon.

MARK: I'm from VRS, I'll meet with you whenever you're ready. We with multiple organizations that went through this. We can provide multiple sources for you as to protocol levels and solutions and optioned. We've partnered with others in industry.

RICHARD HOVEY: Everything doesn't have to be dumbed down for the commission.
...Laughter...

MIKE JACOBS: On that note...
Jeff, we do need to wrap this up.

JEFF ROSEN: I promise to keep it brief. We've asked Gallaudet University technology assistance problem, TAP, Judy Harkins direct that problem to help us with this issue, she developed a white paper on the issue. But the IT folks are still resistant to the idea of opening up anything in their system. They don't mind necessarily having something external on the outside. But they don't want anything inside the system. We could discuss what technological issues there are until we're blue in the face. The IT folks are resistant. Maybe something has to come from OMB on this issue, because really, they can put the fear of God into the federal IT people. Other than that, good luck, it's really a challenge. The bottom line is that a lot of folks are experiencing barriers right now in the workplace and not experiencing access. That's just a common discuss, we'll follow up with you on this and be happy to meet with you shortly on it.

MIKE JACOBS: Rich's number...
...Laughter...
I think run out of time. We could go on hours. I think we discussed a heck of a lot today. Hopefully we've moved closer to some common understanding of things, and also we have a lot of digest. We know we have a lot to do. Everyone has a lot to do, including us in the next six weeks. So I say thank you. And you know, we'll continue at it.